April 6, 2016

Chair Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: The Health Landscape 2030 Discussion Paper and Natural & Working Lands Workshop

Dear Chair Nichols,

On behalf of the Santa Clara Valley Open Space Authority (OSA), we are pleased to submit the following comments in response to the *Healthy Landscapes 2030: California's Climate Change Vision and Goals for Natural and Working Lands* discussion paper (discussion paper). OSA is an open space special district in Santa Clara County whose mission is to conserve natural resources, support agriculture, and connect people to nature.

In general, we are very supportive of the discussion paper, as it outlines many principles and implementation strategies that we believe will be effective in achieving our GHG emission reduction targets through natural and working lands. In the following comments, we provide responses to the discussion questions agency staff asked in the discussion paper and at the joint agency natural and working lands workshop held March 23 to inform development of the 2030 Scoping Plan Update.

1. **For each land type, on what metrics should these quantitative goals be based?**

The discussion paper recognized that forests, rangelands, farms, wetlands, riparian areas and other types of lands have the ability to store substantial amounts of carbon. The discussion paper also stated that storing carbon in natural and working lands is the most effective way to remove carbon emissions from the atmosphere. We strongly agree with this approach, and recommend that carbon sequestration accounting methods be used to measure quantitative goals for natural and working lands. While vehicle-miles traveled are a common approach to measuring this, we do not believe it fully captures the benefits of protecting and enhancing natural and working lands. Science has shown that adjusting our management practices on ranchlands can enhance the carbon sequestration capabilities of grasslands[1,2]. These practices also have multiple co-benefits, including improving soil health, increasing soil water retention, and increasing restoration and enhancement of wildlife habitat areas that should be considered.

The discussion paper identified as a key objective increasing protection of natural and working lands to reduce the rate of conversion to carbon intensive uses. OSA strongly agrees with this objective, and feels that avoided greenhouse gas emissions through protection from carbon-intensive conversion should be incorporated into these metrics as well. Furthermore, employing on-farm practices that reduce carbon-intensive energy consumption through water and energy efficiency and renewable

[1]Delonge, M. S., Ryals, R., & Silver, W. L. (2013). A Lifecycle Model to Evaluate Carbon Sequestration Potential and Greenhouse Gas Dynamics of

[2]Marcia S. DeLonge, Justine J. Owen, and Whendee L. Silver. 2014. Greenhouse Gas Mitigation Opportunities in California Agriculture: Review of California Rangeland Emissions and Mitigation Potential. NI GGMOCA R 4. Durham, NC: Duke University.

energy production can contribute significantly to emission reductions, which should also be included in emission reduction quantification protocols.

2. **What is the appropriate timescale for goal-setting, and what principles should be applied in choosing timeframes over which outcomes are assessed?**

OSA believes that as it relates to timescales for goal-setting, staff needs to carefully balance allowing enough time to accumulate and assess the effectiveness of a diverse range of practices and land acquisition transactions, but not wait so long that policy and funding levels are not in sync with the lessons learned from these practices. Policy and funding needs to be adjusted accordingly from time to time as we continue to better understand the best practices and strategies for reducing GHG-emissions and carbon sequestration in natural and working lands. Because it can take some time to see the results of adjusted land management practices as well as fully complete a land acquisition or conservation easement transaction, **OSA recommends staff use a 3-year timescale for goal-setting.**

3. **What is the appropriate spatial scale for goals?**

Santa Clara County, where OSA operates, is expected to see its population grow to almost 400,000 in the next 25 years. This growth, in addition to Silicon Valley's thriving economic engine, creates tremendous pressure to convert natural and working lands for homes and businesses at the edge of these urban centers. While protection of large landscapes further from urban areas often provide cost-effective results in terms of dollars spent protecting each acre, it is important to consider the GHG reduction benefits of protecting lands located at the urban edge. Smaller acreages, such as in the 50-200 acre range, when strategically located at the urban edge, can have dramatic GHG emission reduction benefits, given the intensity of development and traffic patterns neighboring dense, heavily populated urban areas. OSA believes staff should consider these smaller, strategic parcels of land in when setting spatial scale goals as part of its planning and conservation efforts.

4. **How can we grow cross-sector synergies that promote land stewardship and system-wide GHG reductions?**

The March 23 natural and working lands workshop and discussion paper outlined a multi-faceted approach to protect natural and working lands that will yield cross-sector synergies, such as limiting urban sprawl by promoting infill development. To maximize these potential cross-sector synergies, OSA recommends staff fully consider existing and future statewide SB 375 sustainable community planning efforts. For example, Plan Bay Area outlines an approach to integrated, long-range transportation, housing, and land-use planning, and identifies several Priority Conservation Areas. Staff should carefully review these existing plans to identify opportunities to increase cross-sector synergies and to better coordinate their planning efforts with existing planning activities.

Furthermore, staff should fully consider the co-benefits that can result from increased cross-sector synergies. For example, promoting infill development and thus protecting natural and working lands from conversion also yields multiple co-benefits that include the protection of wildlife corridors, reducing flood risk, and increasing groundwater capture.

Overall, OSA strongly supports the direction of the natural and working lands workshop and discussion paper. California's natural and working lands continue to be a critical component to reducing GHG

emissions in the state, and we hope to see them further integrated with state efforts to achieve those ends. We appreciate the opportunity to provide comments for your consideration.

Sincerely,

Andrea Mackenzie
General Manager